

FILED

AUG - 2 2017

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TREVOR HAWKINS

and

PARIS RUSSO,

Defendants.

No.

4:17CR000349 RLW/NAB

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

[Conspiracy to Commit Bank Fraud]

1. From in or about May of 2015 through in or about March of 2016, in the Eastern District of Missouri and elsewhere, the defendants,

TREVOR HAWKINS

and

PARIS RUSSO,

and other conspirators, both known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to commit the following offense against the United States:

- a. To knowingly execute and attempt to execute a scheme or artifice to defraud and to obtain money, funds, credits, assets, securities owned by and under the custody and control of a financial institution as defined under Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses, representations and promises in violation of Title 18, United States Code, Section 1344.

MANNER AND MEANS OF THE CONSPIRACY

2. The primary purpose of the conspiracy was for the defendants fraudulently to obtain United States currency from various financial institutions, including Key Bank, a financial institution insured by the Federal Deposit Insurance Corporation, and US Bank, a financial institution insured by the Federal Deposit Insurance Corporation.

3. Defendant Trevor Hawkins would provide defendant Paris Russo and other conspirators with identification documents for legitimate customers of these financial institutions.

4. Defendant Paris Russo and other conspirators would then impersonate legitimate customers of Key Bank and US Bank with existing bank accounts and conduct counter withdrawal transactions, often converting the proceeds to cashier's checks.

5. It was a part of the conspiracy that the conspirators travelled to U.S. Bank and Key Bank locations throughout the United States, including Missouri, Washington, Kansas and Illinois.

6. It was a part of the conspiracy that defendant Paris Russo used false forms of identification, typically, forged drivers' licenses purporting to issue from the state of Ohio, in order to obtain the proceeds of the unauthorized counter withdrawals.

7. It was further a part of the conspiracy that Trevor Hawkins instructed defendant Paris Russo and other conspirators to falsely represent to the financial institutions from which they

were making withdrawals that they were authorized account holders and to withdraw funds from customer accounts.

All in violation of 18 U.S.C. § 1349.

A TRUE BILL

FOREPERSON

CARRIE COSTANTIN
Acting United States Attorney

GWENDOLYN E. CARROLL
Assistant United States Attorney